

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE, CLARE BRONFMAN,
and KATHY RUSSELL

Defendants.

Case No. 18 Cr. 00204-NGG

NOTICE OF MOTION

PLEASE TAKE NOTICE that the undersigned attorney, Paul DerOhannesian II, for the Defendant, KEITH RANIERE, will move the Honorable Nicholas G. Garaufis, United States District Judge for the Eastern District of New York, for an order granting the following relief:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. To preclude the Government from introducing evidence regarding Clare Bronfman's contributions to a defense Trust.

[REDACTED]

These motions are based on this Notice of Motion, the accompanying Declaration of Paul DerOhannesian II, and the accompanying Memorandum of Law in Support of Raniere's Motions *In Limine*.

Dated: April 19, 2019
Albany, New York

Respectfully submitted,

/s/ Paul DerOhannesian II, Esq.
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